



March 5, 2010

264204.19.H2.01/PC386P117B

Ms. Janet Naito
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2721

Subject: Responses to January 20, 2010, Department of Toxic Substances Control
Comments on Cleanup Plan for Pits in Polychlorinated Biphenyl Site Building 386
AL#01 in Investigation Area C2, Lennar Mare Island, Vallejo, California

Dear Ms. Naito:

Enclosed are the responses to January 20, 2010, comments from the State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) (DTSC 2010), on "Cleanup Plan for Pits in Polychlorinated Biphenyl Site Building 386 AL#01, Investigation Area C2, Lennar Mare Island, Vallejo, California" (CH2M HILL 2009) (cleanup plan). This letter and response to comments (see attached table) were prepared by CH2M HILL on behalf of Lennar Mare Island, LLC (LMI), as part of the scope of the Environmental Services Cooperative Agreement to complete remaining environmental work at Mare Island, and in accordance with the Consent Agreement between LMI, the City of Vallejo, and DTSC.

Background

The cleanup plan proposes removing concrete from three locations from Pit 3 at PCB Site Building 386 AL#01: from the entire north sidewall of Pit 3 around sample locations B386PIT3CS0822 through B386PIT3CS0827, from the entire south sidewall around sample locations B386PIT3CS0828 through B386PIT3CS0833, and an approximately 5-by 5-foot area around floor sample location B386PIT3CS0834 (19 milligrams per kilogram). Verification concrete chip samples will be collected following the concrete removal actions to confirm remaining polychlorinated biphenyl (PCB) concentrations meet the cleanup goals. In accordance with the *Final Interim Removal Action Work Plan for Indoor Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel* (CH2M HILL 2006), a site-specific risk evaluation will be prepared to demonstrate that the potential risk associated with exposure to residual PCBs is an acceptable value within the risk-management range (1×10^{-4} to 1×10^{-6}) and a hazard index of less than 1. The potential risks associated with the remaining total PCB concentrations will be calculated and presented in an implementation report, which will be submitted to DTSC after the proposed remedial actions are complete.

Please provide your approval of the proposed cleanup plan for Pits at PCB Site Building 386 AL#01, with the clarifications provided in this letter and the attached response to

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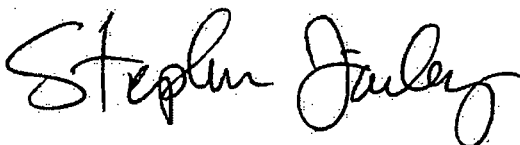
comments, to me at the above address or via email at Stephen.Farley@ch2m.com by March 23, 2010. We are requesting a shorter review time to accommodate field work schedules. If you have questions regarding this document, please contact me at 707/562-1015, extension 103, or Jennifer Lindquist at 530/229-3224.

Sincerely,

CH2M HILL



Jennifer Lindquist
Project Manager



Stephen M. Farley, P.G.
Senior Technical Consultant

RDD/100630025 (CAH4569.doc)
ES030410174032RDD

Enclosure: Response to Comments, revised Table 1, revised Figure 3

References

CH2M HILL. 2006. *Final Interim Removal Action Work Plan for Indoor Polychlorinated Biphenyl Sites in the Eastern Early Transfer Parcel*. August 6.

_____. 2009. "Cleanup Plan for Pits in Polychlorinated Biphenyl Site Building 386 AL#01 in Investigation Area C2, Lennar Mare Island, Vallejo, California," October 6.

State of California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). 2010. Untitled letter regarding comments on cleanup plan for Pits in PCB Site Building AL#01. January 20.

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Copy to (with enclosures):

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**Response to Comments Regarding the
Cleanup Plan for Pits in PCB Site Building 386 AL#01, Investigation Area C2, dated October 6, 2009
from
Department of Toxic Substances Control on January 20, 2010**

No.	Section	Comments	Responses
Ms. Janet Naito DTSC Comments			
1		<p><u>General comment</u></p> <p>Characterization samples were collected from nine of 15 pits present within the building. PCBs were detected in eight of the nine pits, with total PCB concentrations ranging from 0.021 mg/kg (Pit 8) to 7.5 mg/kg (Pit 3). Total PCBs were detected above the cleanup goal of 0.74 mg/kg in Pits 2 and 3. However, according to Table 1 in the Cleanup Plan, the total PCB concentration for Pit 2 was significantly influenced by an elevated detection limit for Aroclor 1260. The sidewalls and floors of Pit 3 were pressure washed and additional sidewall and bottom concrete chip samples were collected. However, it is unclear whether the entire pit was pressure washed as the entire pit was not resampled after the time the pressure washing occurred. Additionally, not all side walls have been sampled and portions of the pit base have not been sampled.</p>	<p>After reviewing the laboratory analytical reports for samples collected from the Pits in Building 386, an error was discovered in the reported analytical results for sample B386AL01CS0802, which was collected from Pit 2. The reported proxy value for Aroclor-1260 of 0.54 mg/kg is a detected concentration. The total PCB concentration is calculated by summing all of the detected Aroclors or by using a proxy value for one-half the detection level for historically detected Aroclors and adding this to detected Aroclors. The total PCB concentration in B386AL01CS0802 is 0.75 J mg/kg - the sum of detected Aroclor-1254 (0.2J mg/kg), detected Aroclor-1260 (0.54 mg/kg), proxy value for Aroclor-1248 (0.0005 mg/kg), and proxy value for Aroclor-1242 (0.006 mg/kg). A revised Table 1 is attached showing the correct detected and proxy values for each sample.</p> <p>In January 2009, CH2M HILL supervised the pressure-washing of the Pits in Building 386. All exposed surface areas of the concrete Pit 3 were pressure washed. However, ancillary equipment associated with a steam-powered hydraulic forge formerly located within Pit 3 was still present in the southwest portion of the pit during pressure-washing activities. All horizontal and vertical accessible concrete surfaces around the ancillary equipment were pressure washed and scrubbed with an industrial-strength surfactant.</p> <p>All horizontal and vertical surfaces of Pit 3 were pressure washed. Concrete samples were collected from heavily stained locations in Pit 3 following the pressure washing (see the attached revised Figure 3 for the locations of the concrete samples).</p>

**Response to Comments Regarding the
Cleanup Plan for Pits in PCB Site Building 386 AL#01, Investigation Area C2, dated October 6, 2009
from
Department of Toxic Substances Control on January 20, 2010**

No.	Section	Comments	Responses
1.		If residual PCB concentrations remain above standards appropriate for unrestricted use of the property, the remedy must include execution and recordation of a land use covenant placing appropriate limitations on land use in accordance with California Code of Regulations section 67391.1.	A site-specific land use covenant will be recorded for PCB Site Building 386 AL#01 Pit 3 in accordance with California Code of Regulations, Title 22, Chapter 39, Section 67391.1.
2.		Please verify the total PCB value calculated for sample number B386AL01CS0802 collected from Pit 2 on July 30, 2008. The proxy value set for Aroclor-1260 of 0.54 mg/kg is set at one-half the detection limit. This detection limit appears inconsistent with the levels of Aroclor-1016, 1242 and 1254 detected.	A revised Table 1 is attached showing the correct detected and proxy values for Aroclors in each sample. See the updated calculation of total PCB concentration for B386AL01CS0802 in the response to General Comment 1. above.
3.		Please specify the areas of Pit 3 that were not pressure-washed. Page 3, Second full paragraph, last sentence implies that the entire pit was pressure washed. However, concrete chip samples were not collected from all areas following pressure washing.	See response to Comment 1.
4.		The characterization samples originally collected from the pits were to determine whether PCBs were present. For those pits where PCBs were present, sufficient rationale for not conducting additional sampling should be provided (e.g., the most visibly contaminated area were sampled).	The original characterization sampling (one concrete chip sample from each of nine pits) was performed at the direction of DTSC (CH2M HILL 2008). DTSC requested one concrete chip or water sample be collected from each of the nine pits. Because the concrete chip sample collected from Pit 3 was the only sample in which total PCB concentrations exceeded cleanup goals, CH2M HILL collected additional concrete chip samples from visibly stained areas.
5.		Figure 3. a. The sidewall representations do not show the samples at the depths indicated in the figure. For example, sample B386AL01CS0814 is shown between samples B386PIT3CS0829 and B386PIT3CS0832. However, within the figure, sample B386AL01CS0814 is labeled with a depth of 3 feet, sample B386PIT3CS0829 is labeled with a depth of 4 feet and sample B386PIT3CS0832 is labeled with a depth of 7 feet. Similar problem encountered on the north side wall for the middle sample.	a. Revised Table 1 is attached. b. Revised Figure 3 is attached to show the correct sample locations. c. Revised Figure 3 shows samples IDs and concentrations collected prior to pressure washing in gray font.

**Response to Comments Regarding the
Cleanup Plan for Pits in PCB Site Building 386 AL#01, Investigation Area C2, dated October 6, 2009
from
Department of Toxic Substances Control on January 20, 2010**

No.	Section	Comments	Responses
		<p>b. On the sidewall representations, the sidewall, samples B386PIT3CS0828 and B385PIT3CS0830 appear to have switched locations, as do the lower two samples (B386PIT3CS0831 and B386PIT3CS0833).</p> <p>c. Samples collected both before and after pressure washing are included in this figure. If an area was pressure-washed and the sample result shown on the figure was collected prior to pressure-washing, an asterisk or some other identifier should be used to qualify the data.</p>	

References:

CH2M HILL. 2008. Email from Michael Sanchez/CH2M HILL to Henry Chui/DTSC regarding "Building 386 pit sampling." July 16.

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386AL01CS0801	Concrete	07/30/2008	8.0	0.39J	Pit 1, collected from center floor, removed Proxy value for Aroclor-1016 0.003 mg/kg Proxy value for Aroclor-1242 0.005 mg/kg Aroclor-1254 = 0.14J mg/kg Aroclor-1260 = 0.24 mg/kg
B386AL01CS0802	Concrete	07/30/2008	8.0	0.75J	Pit 2, collected from center floor, removed Proxy value for Aroclor-1016 0.003 mg/kg Proxy value for Aroclor-1242 0.006 mg/kg Aroclor-1254 = 0.2J mg/kg Aroclor-1260 = 0.54 mg/kg
B386AL01CS0803	Concrete	07/30/2008	8.0	7.5J	Pit 3, collected from center floor, removed Aroclor-1016 = 1.6 mg/kg Proxy value for Aroclor-1242 0.04 mg/kg Aroclor-1254 = 5.5 mg/kg Aroclor-1260 = 0.34J mg/kg
B386AL01CS0806	Concrete	07/30/2008	8.0	0.57	Pit 10, collected from center floor, removed Aroclor-1016 = 0.097 mg/kg Proxy value for Aroclor-1242 0.012 mg/kg Aroclor-1254 = 0.31 mg/kg Aroclor-1260 = 0.156 mg/kg
B386AL01CS0807	Concrete	07/29/2008	4.0	<0.0042	Pit 9, collected from center floor, removed Proxy value for Aroclor-1016 0.0011 mg/kg Proxy value for Aroclor-1242 0.0021 mg/kg Proxy value for Aroclor-1254 0.00034 mg/kg Proxy value for Aroclor-1260 0.00062 mg/kg
B386AL01CS0808	Concrete	07/29/2008	4.0	0.021J	Pit 8, collected from center floor, removed Proxy value for Aroclor-1016 0.0011 mg/kg Proxy value for Aroclor-1242 0.0021 mg/kg Proxy value for Aroclor-1254 0.0003 mg/kg Aroclor-1260 = 0.017J mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386AL01CS0804	Water	08/22/2008	NA	<1 µg/L	Pit 4 water sample; water pumped out of pit Proxy value for Aroclor-1016 0.25 µg/L Proxy value for Aroclor-1242 0.25 µg/L Proxy value for Aroclor-1254 0.25 µg/L Proxy value for Aroclor-1260 0.25 µg/L
B386AL01CS0805	Concrete	08/26/2008	0.0	0.028	Pit 5, collected next to pit on east side, removed Proxy value for Aroclor-1016 0.001 mg/kg Proxy value for Aroclor-1242 0.0005 mg/kg Aroclor-1254 = 0.025 mg/kg Proxy value for Aroclor-1260 0.001 mg/kg
B386AL01CS0809	Concrete	09/11/2008	2.0	6.5J	Pit 3, collected from north floor, removed Aroclor-1016 = 2.4 mg/kg Proxy value for Aroclor-1242 0.021 mg/kg Aroclor-1254 = 3.8 mg/kg Aroclor-1260 = 0.31J mg/kg
B386AL01CS0810	Concrete	09/11/2008	2.0	5.4J	Pit 3, collected from north floor, removed Proxy value for Aroclor-1016 0.02 mg/kg Proxy value for Aroclor-1242 0.04 mg/kg Aroclor-1254 = 5.0 mg/kg Aroclor-1260 = 0.31J mg/kg
B386AL01CS0811	Concrete	09/11/2008	7.0	7.7J	Pit 3, collected from center floor, removed Aroclor-1016 = 0.92 mg/kg Proxy value for Aroclor-1242 0.043 mg/kg Aroclor-1254 = 6.2 mg/kg Aroclor-1260 = 0.54J mg/kg
B386AL01CS0812	Concrete	09/11/2008	3.5	14	Pit 3, collected from north sidewall, removed Aroclor-1016 = 6.4mg/kg Proxy value for Aroclor-1242 0.04 mg/kg Aroclor-1254 = 7.9 mg/kg Proxy value for Aroclor-1260 0.01 mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386AL01CS0813	Concrete	09/11/2008	7.0	0.066	Pit 3, collected from center floor, removed Proxy value for Aroclor-1016 0.001 mg/kg Proxy value for Aroclor-1242 0.002 mg/kg Aroclor-1254 = 0.06 mg/kg Proxy value for Aroclor-1260 0.0006 mg/kg
B386AL01CS0814	Concrete	09/11/2008	4.0	15	Pit 3, collected from south sidewall, removed Aroclor-1016 = 3.5 mg/kg Proxy value for Aroclor-1242 0.06 mg/kg Aroclor-1254 = 11.7 mg/kg Proxy value for Aroclor-1260 0.018 mg/kg
B386AL01CS0815	Concrete	09/11/2008	7.0	1.1J	Pit 3, collected from center floor, removed Aroclor-1016 = 0.207 mg/kg Proxy value for Aroclor-1242 0.0107 mg/kg Aroclor-1254 = 0.795 mg/kg Aroclor-1260 = 0.54J mg/kg
B386AL01CS0816	Concrete	09/11/2008	7.0	3.8J	Pit 3, collected from center floor, removed Aroclor-1016 = 0.68 mg/kg Proxy value for Aroclor-1242 0.02 mg/kg Aroclor-1254 = 2.9 mg/kg Aroclor-1260 = 0.2J mg/kg
B386AL01CS0817	Concrete	09/11/2008	2.0	0.54J	Pit 3, collected from south floor, removed Aroclor-1016 = 0.261 mg/kg Proxy value for Aroclor-1242 0.0042 mg/kg Aroclor-1254 = 2.61 mg/kg Aroclor-1260 = 0.0174J mg/kg
B386AL01CS0818	Concrete	09/11/2008	2.0	4.4J	Pit 3, collected from south floor, removed Proxy value for Aroclor-1016 0.02 mg/kg Proxy value for Aroclor-1242 0.04 mg/kg Aroclor-1254 = 4.05 mg/kg Aroclor-1260 = 0.3J mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386AL01CS0819	Concrete	09/30/2008	7.0	1.2	Pit 3, collected from west floor, removed Aroclor-1016 = 0.46 mg/kg Proxy value for Aroclor-1242 0.01 mg/kg Aroclor-1254 = 0.77 mg/kg Proxy value for Aroclor-1260 0.003 mg/kg
B386AL01CS0820	Concrete	09/30/2008	7.0	0.77	Pit 3, collected from west floor Aroclor-1016 = 0.374 mg/kg Proxy value for Aroclor-1242 0.04 mg/kg Aroclor-1254 = 4.05 mg/kg Aroclor-1260 = 0.295J mg/kg
B386PIT4CS0801	Concrete	01/09/2009	10.0	<0.0044	Pit 9, collected from center floor, removed Proxy value for Aroclor-1016 0.0013 mg/kg Proxy value for Aroclor-1242 0.0005 mg/kg Proxy value for Aroclor-1254 0.0013 mg/kg Proxy value for Aroclor-1260 0.0013 mg/kg
B386PIT5CS0802	Concrete	01/13/2009	10.0	<0.005J	Pit 9, collected from center floor, removed Proxy value for Aroclor-1016 0.0014 mg/kg Proxy value for Aroclor-1242 0.0006 mg/kg Proxy value for Aroclor-1254 0.0014 mg/kg Proxy value for Aroclor-1260 0.0015 mg/kg
B386PIT7CS0803	Concrete	01/12/2009	10.0	<0.005	Pit 9, collected from center floor, removed Proxy value for Aroclor-1016 0.0014 mg/kg Proxy value for Aroclor-1242 0.0006 mg/kg Proxy value for Aroclor-1254 0.0014 mg/kg Proxy value for Aroclor-1260 0.0014 mg/kg
B386PIT3CS0821	Concrete	01/15/2009	18.5	0.059	Pit 3, collected from floor of vault after pressure washing Proxy value for Aroclor-1016 0.001 mg/kg Aroclor-1242 = 0.036 mg/kg Aroclor-1254 = 0.02 mg/kg Proxy value for Aroclor-1260 0.002 mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386PIT3CS0822	Concrete	02/10/2009	4.0	4.1	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.007 mg/kg Aroclor-1242 = 2.9 mg/kg Aroclor-1254 = 1.2 mg/kg Proxy value for Aroclor-1260 0.008 mg/kg
B386PIT3CS0823	Concrete	02/10/2009	4.0	15	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.037 mg/kg Aroclor-1242 = 8.2 mg/kg Aroclor-1254 = 6.9 mg/kg Proxy value for Aroclor-1260 0.038 mg/kg
B386PIT3CS0824	Concrete	02/10/2009	4.0	23	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.037 mg/kg Aroclor-1242 = 14 mg/kg Aroclor-1254 = 8.9 mg/kg Proxy value for Aroclor-1260 0.038 mg/kg
B386PIT3CS0825	Concrete	02/10/2009	7.0	3.6	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.008 mg/kg Aroclor-1242 = 2.4 mg/kg Aroclor-1254 = 1.2 mg/kg Proxy value for Aroclor-1260 0.008 mg/kg
B386PIT3CS0826	Concrete	02/10/2009	7.0	9.9	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.015 mg/kg Aroclor-1242 = 5.2 mg/kg Aroclor-1254 = 4.7 mg/kg Proxy value for Aroclor-1260 0.015 mg/kg
B386PIT3CS0827	Concrete	02/10/2009	7.0	30	Pit 3, collected from north sidewall after pressure washing Proxy value for Aroclor-1016 0.08 mg/kg Aroclor-1242 = 19 mg/kg Aroclor-1254 = 11 mg/kg Proxy value for Aroclor-1260 0.08 mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386PIT3CS0828	Concrete	02/10/2009	4.0	14	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.04 mg/kg Aroclor-1242 = 5 mg/kg Aroclor-1254 = 8.6 mg/kg Proxy value for Aroclor-1260 0.04 mg/kg
B386PIT3CS0829	Concrete	02/10/2009	4.0	17	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.04 mg/kg Aroclor-1242 = 3.4 mg/kg Aroclor-1254 = 14 mg/kg Proxy value for Aroclor-1260 0.04 mg/kg
B386PIT3CS0830	Concrete	02/10/2009	4.0	23	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.04 mg/kg Aroclor-1242 = 3.6 mg/kg Aroclor-1254 = 19 mg/kg Proxy value for Aroclor-1260 0.04 mg/kg
B386PIT3CS0831	Concrete	02/10/2009	7.0	10	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.015 mg/kg Aroclor-1242 = 5.1 mg/kg Aroclor-1254 = 5.1 mg/kg Proxy value for Aroclor-1260 0.015 mg/kg
B386PIT3CS0832	Concrete	02/10/2009	7.0	11	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.02 mg/kg Aroclor-1242 = 3.2 mg/kg Aroclor-1254 = 8.2 mg/kg Proxy value for Aroclor-1260 0.02 mg/kg
B386PIT3CS0833	Concrete	02/10/2009	7.0	14	Pit 3, collected from south sidewall after pressure washing Proxy value for Aroclor-1016 0.02 mg/kg Aroclor-1242 = 3.1 mg/kg Aroclor-1254 = 11 mg/kg Proxy value for Aroclor-1260 0.02 mg/kg

REVISED TABLE 1

Sample Results for Pits in PCB Site Building 386 AL#01

PCB Sites, Lennar Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	Sample Depth (feet bgs)	Total PCB Concentration ^a (mg/kg)	Comments ^b
B386PIT3CS0834	Concrete	02/10/2009	12.0	19	Pit 3, collected from west floor area after pressure washing Proxy value for Aroclor-1016 0.03mg/kg Aroclor-1242 = 14 mg/kg Aroclor-1254 = 4.9 mg/kg Proxy value for Aroclor-1260 0.03mg/kg
B386PIT3CS0835	Concrete	02/10/2009	12.0	1.5	Pit 3, collected from west floor area after pressure washing Proxy value for Aroclor-1016 0.03 mg/kg Aroclor-1242 = 0.9mg/kg Aroclor-1254 = 0.5mg/kg Proxy value for Aroclor-1260 0.03 mg/kg
B386PIT3CS0836	Concrete	02/10/2009	12.0	1.4	Pit 3, collected from west floor area after pressure washing Proxy value for Aroclor-1016 0.003 mg/kg Aroclor-1242 = 0.75 mg/kg Aroclor-1254 = 0.62 mg/kg Proxy value for Aroclor-1260 0.003 mg/kg

^aTotal PCBs are calculated by summing all of the detected Aroclors or by using a proxy value of one-half the laboratory detection level for historically detected Aroclors and adding this to detected Aroclors.

^bThree significant figures were used for certain proxy values to eliminate rounding errors when calculating total PCB concentrations.

Notes:

Samples were collected by CH2M HILL.

Laboratory results for water samples are reported as total PCBs

bgs = below ground surface.

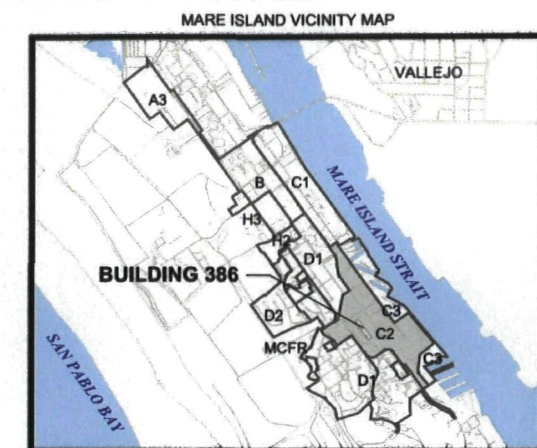
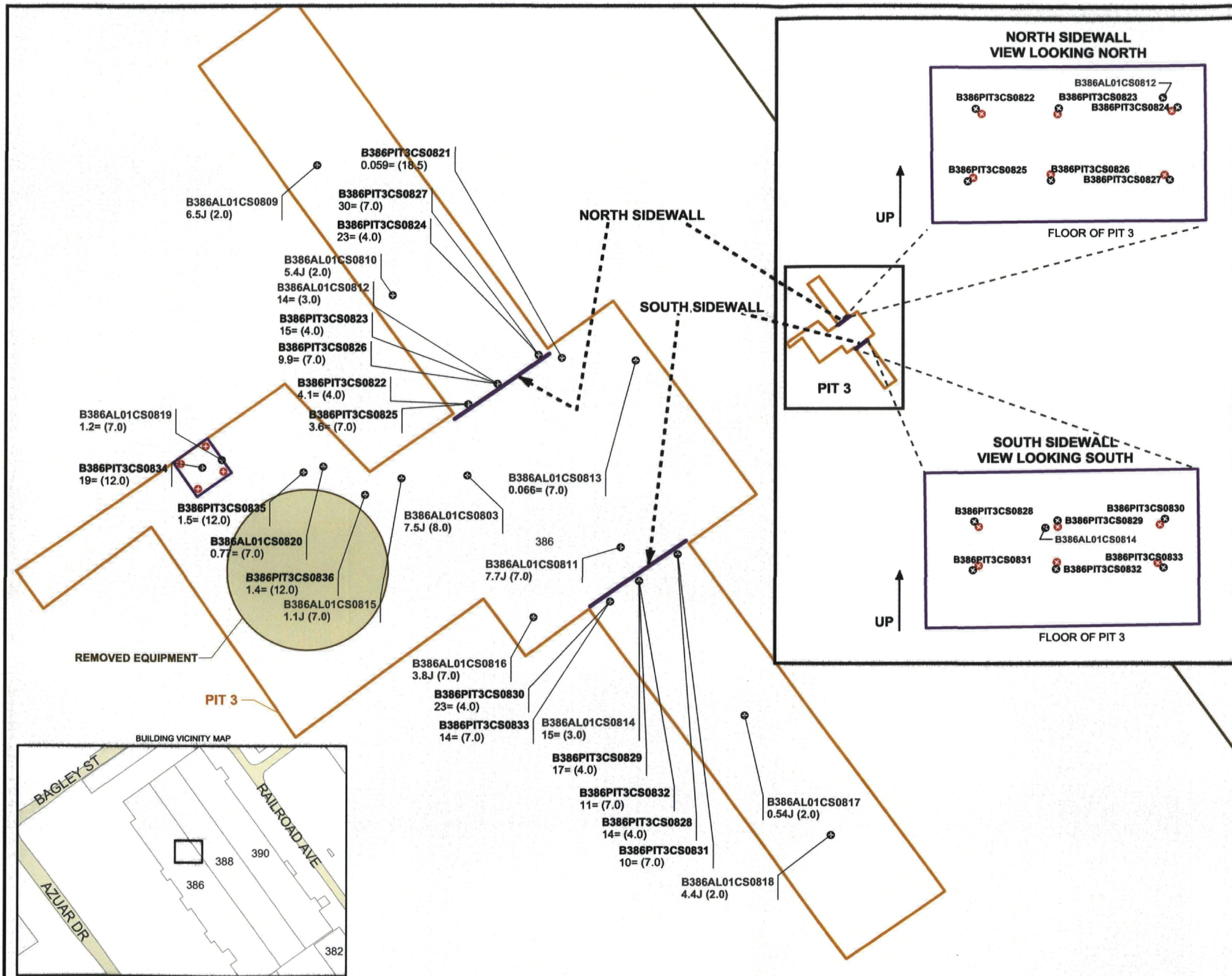
J = estimated concentration.

mg/kg = milligrams per kilogram.

NA = not applicable.

PCB = polychlorinated biphenyl.

µg/L = micrograms per liter



- LEGEND**
- ⊕ CONCRETE CHIP SAMPLE
 - ⊕ PROPOSED CONCRETE CHIP SAMPLE FOLLOWING CLEANUP ACTION
 - PIT
 - ▭ PROPOSED REMOVAL AREA
 - ▭ STRUCTURE
 - ▭ ROAD

SAMPLE LOCATION ————— IR14VB219
 PCB CONCENTRATION (mg/kg) ————— 86FJ (2.8)
 SAMPLE BEGINNING DEPTH (FEET BGS) —————

- NOTES:**
1. "<" = NOT DETECTED AT OR ABOVE THE INDICATED CONCENTRATION
 2. "=" = ANALYTE WAS DETECTED
 3. "J" = ESTIMATED DETECTED RESULT
 4. ANALYTE = TOTAL PCBs
 5. FOR SAMPLES COLLECTED BY CH2M HILL, TOTAL PCBs ARE CALCULATED BY SUMMING ALL OF THE DETECTED AROCLORS OR BY USING A PROXY VALUE OF ONE-HALF THE DETECTION LEVEL FOR HISTORICALLY DETECTED AROCLORS AND ADDING THIS TO DETECTED AROCLORS
 6. GRAY LABEL = REMOVED SAMPLE LOCATION
 7. LENNAR MARE ISLAND, INC. REMOVED EQUIPMENT FROM PIT 3 IN JULY 2009
 8. THE MEASUREMENT FOR SAMPLE DEPTHS IS THE FLOOR OF BUILDING 386

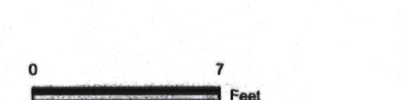


FIGURE 3
REVISED PCB SITE BUILDING 386 AL#01
PIT 3 PROPOSED REMOVAL AREAS
AND TOTAL PCB CONCENTRATIONS
 LENNAR MARE ISLAND, CALIFORNIA

CH2MHILL